

Ex. 3

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17 **UNITED STATES DISTRICT COURT**

18 **NORTHERN DISTRICT OF CALIFORNIA**

19 CISCO SYSTEMS, INC., )  
 )  
 20 Plaintiff, )  
 )  
 21 v. )  
 )  
 22 ARISTA NETWORKS, INC., )  
 )  
 23 Defendant. )  
 )  
 24 )

CASE NO. 5:14-cv-05344-BLF

**PLAINTIFF CISCO SYSTEMS, INC.'S  
 SECOND SUPPLEMENTAL  
 OBJECTIONS AND RESPONSES TO  
 DEFENDANT ARISTA NETWORKS,  
 INC.'S FIRST SET OF  
 INTERROGATORIES**

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1 Pursuant to Rules 26 and 33 of the Federal Rules of Civil Procedure, Plaintiff Cisco  
2 Systems, Inc. ("Cisco"), by counsel, hereby provides its second supplemental objections and  
3 responses to Defendant Arista Networks, Inc.'s ("Arista's") First Set of Interrogatories, which  
4 were served on Cisco on April 10, 2015 (the "Interrogatories").

5 **GENERAL OBJECTIONS**

6 Cisco makes the following general objections to Arista's Interrogatories, which apply to  
7 each interrogatory regardless of whether the general objections are specifically incorporated into  
8 the specific objections and responses below.

9 1. Cisco is responding to each interrogatory as it interprets and understands each  
10 interrogatory with respect to the issues in this Litigation. If Arista asserts a different  
11 interpretation of any interrogatory, Cisco reserves the right to supplement or amend its responses  
12 or objections.

13 2. Cisco objects to each interrogatory to the extent it is inconsistent with or seeks to  
14 impose obligations beyond those imposed by the Federal Rules of Civil Procedure, the Civil and  
15 Patent Local Rules of the Northern District of California, and any orders governing this Litigation.

16 3. Cisco objects to the definitions of "Cisco," "You," and "Your," to the extent that  
17 the definitions are overly broad and purport to require Cisco to provide information that is not  
18 within the possession, custody, or control of Cisco.

19 4. Cisco objects to Arista's definition of "Asserted Patents" and "Asserted Claim" to  
20 the extent that Arista's use of those terms in its interrogatories to Cisco renders certain of Arista's  
21 Interrogatories as constituting multiple discrete subparts that are in fact multiple, separate  
22 interrogatories.

23 5. Cisco objects to the definitions of "CLI Command" and "Network Management  
24 Product" to the extent that these terms are vague and ambiguous with respect to their scope and  
25 application as used by Arista, rendering these terms at least potentially unclear with respect to  
26 what particular devices are intended to be incorporated thereby, and further on the grounds that  
27 use of the terms in Arista's Interrogatories renders those interrogatories overbroad and unduly  
28 burdensome to the extent that the discovery sought by such interrogatories is not reasonably tied to

1 necessary to understand the relevant structure, function, and operation of Cisco's products relevant  
2 to this Litigation.

3 23. Cisco objects to each interrogatory as premature to the extent it calls for documents  
4 or information that is the subject of later disclosure deadlines in this Litigation and/or expert  
5 reports and testimony, including as set forth in Rule 26(a)(2) of the Federal Rules of Civil  
6 Procedure, the Patent Local Rules of the Northern District of California, and the Case  
7 Management Order to be entered in this Litigation.

8 24. Any Cisco response that it will provide information or produce documents should  
9 not be construed to mean that responsive information or documents in fact exist; only that, if such  
10 relevant, non-privileged, non-objectionable information or documents exist, are in Cisco's  
11 possession, custody, or control, and are located after a reasonable search of the location or  
12 locations where responsive information or documents are likely to be located, such information or  
13 documents will be produced in a timely manner.

14 25. Cisco further reserves all rights to supplement its responses to Arista's  
15 Interrogatories in compliance with the Federal Rules of Civil Procedure, including under Rule  
16 26(e), as well as the Civil and Patent Local Rules of the Northern District of California and any  
17 orders governing this Litigation, and as Cisco's investigation and discovery proceeds in this  
18 Litigation.

19 **RESPONSES TO INTERROGATORIES**

20  
21 **INTERROGATORY NO. 2:**

22 Identify with specificity every similarity that Cisco contends is a basis for its claim of  
23 copyright infringement, including the source material in Cisco's copyrighted work(s) that Cisco  
24 contends is the source of the similarity; the material in the allegedly infringing work(s) that Cisco  
25 contends reflects the similarity, and why Cisco contends that the source material is protected by  
26 copyright.  
27  
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1 **RESPONSE TO INTERROGATORY NO. 2:**

2 Cisco incorporates by reference its General Objections as though fully set forth herein.  
3 Cisco further objects to this interrogatory as irrelevant and not calculated to lead to the discovery  
4 of admissible evidence to the extent it calls for evidence pertaining to specific similarities between  
5 Cisco's copyrighted works and Arista's accused products. Cisco further objects to this  
6 interrogatory to the extent that it calls for information that is publicly available, equally available  
7 to Arista, and/or in Arista's control, and therefore is of no greater burden for Arista to obtain than  
8 for Cisco to obtain. Cisco further objects to this interrogatory as compound. Cisco also objects  
9 to this interrogatory as undefined, vague, ambiguous, overbroad, and unduly burdensome in its use  
10 of the terms "with specificity," "every similarity," "why Cisco contends that the source material is  
11 protected by copyright." Cisco further objects to this interrogatory as premature contention  
12 discovery, especially in light of Arista's failure to produce information regarding its accused  
13 products, including source code. Cisco further objects to this interrogatory on the grounds that it  
14 prematurely seeks expert testimony. Cisco further objects to this interrogatory to the extent it  
15 seeks information that is protected by the attorney-client privilege, that constitutes attorney work-  
16 product, or that is protected by any other applicable privilege, protection, or immunity, including  
17 without limitation in connection with the common interest doctrine.

18 Subject to and without waiver of its general and specific objections, Cisco incorporates by  
19 reference, as if fully set forth herein, its operative complaint and all documents cited therein,  
20 including Cisco's copyright registrations as well as any subsequent amendments thereto. Cisco  
21 further responds, pursuant to Fed. R. Civ. P. 33(d), that Cisco will produce documents containing  
22 information responsive to this interrogatory, which information may be obtained from the  
23 documents by Arista as easily as by Cisco.

24 In addition to the examples set forth in Exhibits 1 and 2 to Cisco's operative complaint,  
25 Cisco identifies in Exhibit A similarities between Cisco's copyrighted works and Arista products.  
26 Each of the Cisco works cited in Exhibit A is protected by copyright because each of these works  
27 constitutes an original work of authorship fixed in a tangible medium of expression. Each Cisco  
28 work in Exhibit A contains expressive content, which is the subject of copyright protection.

1 Further, each Cisco document cited in Exhibit A was first published in the United States and was  
2 authored by at least one author who is a national or domiciliary of the United States. *See, e.g.,*  
3 Cisco copyright registrations attached to Cisco's operative complaint. Cisco has complied with all  
4 applicable statutory formalities related to these copyrighted works. Additionally, because many  
5 of the Cisco works cited in Exhibit A were deposited with copyright registrations within five years  
6 of publication, the certificate of registration for these documents constitutes prima facie evidence  
7 of the validity of the underlying copyrights. *See, e.g.,* Cisco copyright registrations attached to  
8 Cisco's operative complaint. For the remainder of the Cisco works cited in Exhibit A, the  
9 copyright registration certificates constitute evidence of the validity of Cisco's copyrights.

10 Cisco's discovery efforts in this case are ongoing, and Cisco reserves the right to further  
11 supplement this response in light of facts learned during discovery, including information  
12 regarding Arista's accused products and expert discovery.

13  
14 **SUPPLEMENTAL RESPONSE TO INTERROGATORY NO. 2:**

15 Subject to and without waiver of its general and specific objections, Cisco further responds  
16 as follows:

17 The similarity between Cisco's copyrighted works and Arista's accused products is also  
18 evidenced by Arista's copying of numerous multi-word command expressions from Cisco's  
19 copyrighted works. Each of those command expressions identified by Cisco in its copyrighted  
20 works represents an original, creative expression. Attached as Exhibit B is a more  
21 comprehensive listing of the multiword command expressions from Cisco's copyrighted works  
22 that were copied by Arista, as well as the version(s) of Arista's infringing works that contain these  
23 protected elements.

24 Arista also has copied Cisco's copyrighted command hierarchies. The organization of  
25 Cisco's command expressions represents an original, creative contribution to Cisco's copyrighted  
26 works. Because Cisco's command expressions are organized hierarchically, the copying of  
27 Cisco's command expressions, described in Exhibit B, itself reflects Arista's copying of Cisco's  
28 command hierarchies.

1 Arista has also copied Cisco's command modes and prompts, which also represent original  
 2 and creative contributions to Cisco's copyrighted works. For example, Cisco's copyrighted  
 3 works include "EXEC," "Privileged EXEC," "Global configuration," and "Interface  
 4 configuration" modes, the names of which are duplicated in Arista's infringing products, using  
 5 substantially similar prompts. Attached as Exhibit C is a more comprehensive listing of the  
 6 command modes and prompts from Cisco's copyrighted works that were copied by Arista, as well  
 7 as the version(s) of Arista's infringing works that contain these protected elements.

8 Because the burden of finding each of these command expressions, command hierarchies,  
 9 and command modes and prompts in the copyrighted works and the infringing works is the same  
 10 for Arista as it is for Cisco, pursuant to Fed. R. Civ. P. 33(d), Cisco identifies the following  
 11 documents as containing responsive information:

12 IOS v. 11.0: Source Code, CSI-CLI-00403865.

13 IOS v. 11.1: Source Code, CSI-CLI-00403866.

14 IOS v. 11.2: Source Code, CSI-CLI-00403867.

15 IOS v. 11.3: Source Code, CSI-CLI-00403868.

16 IOS v. 12.0: Source Code, CSI-CLI-00403869.

17 IOS v. 12.1: Source Code, CSI-CLI-00403870.

18 IOS v. 12.2: Source Code, CSI-CLI-00403871.

19 IOS v. 12.3: Source Code, CSI-CLI-00403872, CSI-CLI-00403874.

20 IOS v. 12.4: Source Code, CSI-CLI-00403873.

21 IOS v. 15.0: Source Code, CSI-CLI-00054598 – CSI-CLI-00074027, CSI-CLI-00216957 –  
 22 CSI-CLI-00217612, CSI-CLI-00223197 – CSI-CLI-00224078, CSI-CLI-00226300 – CSI-CLI-  
 23 00226709, CSI-CLI-00267773 – CSI-CLI-00268938, CSI-CLI-00271385 – CSI-CLI-00271914,  
 24 CSI-CLI-00274107 – CSI-CLI-00274387, CSI-CLI-00275376 – CSI-CLI-00276837, CSI-CLI-  
 25 00314732 – CSI-CLI-00314943, CSI-CLI-00316210 – CSI-CLI-00317412, CSI-CLI-00317634 –  
 26 CSI-CLI-00317847, CSI-CLI-00318351 – CSI-CLI-00318532, CSI-CLI-00319252 – CSI-CLI-  
 27 00321189, CSI-CLI-00324036 – CSI-CLI-00324389, CSI-CLI-00325497 – CSI-CLI-00325713,  
 28

1 CSI-CLI-00332893 – CSI-CLI-00345450, CSI-CLI-00348572 – CSI-CLI-00348689, CSI-CLI-  
2 00350066 – CSI-CLI-00351948.

3 IOS v. 15.1: Source Code, CSI-CLI-00034689 – CSI-CLI-00054565, CSI-CLI-00223197 –  
4 CSI-CLI-00224078, CSI-CLI-00226300 – CSI-CLI-00226414, CSI-CLI-00226710 – CSI-CLI-  
5 00227953, CSI-CLI-00267773 – CSI-CLI-00268938, CSI-CLI-00314422 – CSI-CLI-00314731,  
6 CSI-CLI-00314944 – CSI-CLI-00316209, CSI-CLI-00317413 – CSI-CLI-00317633, CSI-CLI-  
7 00317848 – CSI-CLI-00318350, CSI-CLI-00318533 – CSI-CLI-00319251, CSI-CLI-00319765 –  
8 CSI-CLI-00325376, CSI-CLI-00325497 – CSI-CLI-00325713, CSI-CLI-00333135 – CSI-CLI-  
9 00333809, CSI-CLI-00337967 – CSI-CLI-00338200, CSI-CLI-00338481 – CSI-CLI-00338696,  
10 CSI-CLI-00338941 – CSI-CLI-00339290, CSI-CLI-00345451 – CSI-CLI-00354832.

11 IOS v. 15.2: Source Code, CSI-CLI-00024968 – CSI-CLI-00034688, CSI-CLI-00074028 –  
12 CSI-CLI-00074113, CSI-CLI-00091773 – CSI-CLI-00091888, CSI-CLI-00098678 – CSI-CLI-  
13 00099910, CSI-CLI-00101493 – CSI-CLI-00101653, CSI-CLI-00102320 – CSI-CLI-00102428,  
14 CSI-CLI-00102615 – CSI-CLI-00102827, CSI-CLI-00104206 – CSI-CLI-00104306, CSI-CLI-  
15 00105599 – CSI-CLI-00105706, CSI-CLI-00106165 – CSI-CLI-00106403, CSI-CLI-00107100 –  
16 CSI-CLI-00107198, CSI-CLI-00108121 – CSI-CLI-00110637, CSI-CLI-00142102 – CSI-CLI-  
17 142151, CSI-CLI-00145892 – CSI-CLI-00145912, CSI-CLI-00146305 – CSI-CLI-00146361,  
18 CSI-CLI-00146494 – CSI-CLI-00146672, CSI-CLI-00150117 – CSI-CLI-00150301, CSI-CLI-  
19 00151700 – CSI-CLI-00151794, CSI-CLI-00153045 – CSI-CLI-00154056, CSI-CLI-00154957 –  
20 CSI-CLI-00154967, CSI-CLI-00161254 – CSI-CLI-00161264, CSI-CLI-00162423 – CSI-CLI-  
21 00162433, CSI-CLI-00162764 – CSI-CLI-00163054, CSI-CLI-00163297 – CSI-CLI-00163575,  
22 CSI-CLI-00163892 – CSI-CLI-00163997, CSI-CLI-00167730 – CSI-CLI-00168576, CSI-CLI-  
23 00168785 – CSI-CLI-00170897, CSI-CLI-00171210 – CSI-CLI-00171263, CSI-CLI-00173118 –  
24 CSI-CLI-00173146, CSI-CLI-00227954 – CSI-CLI-00228224, CSI-CLI-00236536 – CSI-CLI-  
25 00237167, CSI-CLI-00237495 – CSI-CLI-00239781, CSI-CLI-00241096 – CSI-CLI-00248137,  
26 CSI-CLI-00276838 – CSI-CLI-00288213, CSI-CLI-00288322 – CSI-CLI-00289855, CSI-CLI-  
27 00292982 – CSI-CLI-00294561.

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1 IOS v. 15.4: Source Code, CSI-CLI-00074114 – CSI-CLI-00091772, CSI-CLI-00091889 –  
2 CSI-CLI-00098677, CSI-CLI-00217613 – CSI-CLI-00223196 – CSI-CLI-00224078, CSI-CLI-  
3 00224079 – CSI-CLI-00226299, CSI-CLI-00276838 – CSI-CLI-00277169, CSI-CLI-00289856 –  
4 CSI-CLI-00310345, CSI-CLI-00325714 – CSI-CLI-00332892.

5 IOS XR v. 3.0: Source Code, CSI-CLI-00359263 – CSI-CLI-00362850.

6 IOS XR v. 3.2: Source Code, CSI-CLI-00362851 – CSI-CLI-00370474.

7 IOS XR v. 3.3: Source Code, CSI-CLI-00370475 – CSI-CLI-00380671.

8 IOS XR v. 3.4: Source Code, CSI-CLI-00380672 – CSI-CLI-00389727.

9 IOS XR v. 3.5: Source Code, CSI-CLI-00389728 – CSI-CLI-00403864.

10 IOS XR v. 4.3: Source Code, CSI-CLI-00099911 – CSI-CLI-00101492, CSI-CLI-  
11 00101654 – CSI-CLI-00102319, CSI-CLI-00102429 – CSI-CLI-00102614, CSI-CLI-00102828 –  
12 CSI-CLI-00104205, CSI-CLI-00104307 – CSI-CLI-00105598, CSI-CLI-00105707 – CSI-CLI-  
13 00106164, CSI-CLI-00106404 – CSI-CLI-00107099, CSI-CLI-00107199 – CSI-CLI-00108120,  
14 CSI-CLI-00102732 – CSI-CLI-00127155, CSI-CLI-00137956 – CSI-CLI-00142101, CSI-CLI-  
15 00142214 – CSI-CLI-00142101 – CSI-CLI-00143091, CSI-CLI-00143160 – CSI-CLI-00145891,  
16 CSI-CLI-00145913 – CSI-CLI-00146304, CSI-CLI-00146362 – CSI-CLI-00146493, CSI-CLI-  
17 00146673 – CSI-CLI-00150166, CSI-CLI-00150302 – CSI-CLI-00151699, CSI-CLI-00151795 –  
18 CSI-CLI-00153044, CSI-CLI-00154057 – CSI-CLI-00154956, CSI-CLI-00154968 – CSI-CLI-  
19 00161253, CSI-CLI-00161265 – CSI-CLI-00162422, CSI-CLI-00162434 – CSI-CLI-00162763,  
20 CSI-CLI-00163998 – CSI-CLI-00167729, CSI-CLI-00168577 – CSI-CLI-00168784, CSI-CLI-  
21 00170898 – CSI-CLI-00171209, CSI-CLI-00171264 – CSI-CLI-00173117, CSI-CLI-00173147 –  
22 CSI-CLI-00173412.

23 IOS XR v. 5.2: Source Code, CSI-CLI-00110638 – CSI-CLI-00123731, CSI-CLI-  
24 00127156 – CSI-CLI-00137955, CSI-CLI-00142152 – CSI-CLI-00142213, CSI-CLI-00143092 –  
25 CSI-CLI-00143159, CSI-CLI-00163055 – CSI-CLI-00163296, CSI-CLI-00163576 – CSI-CLI-  
26 00163891, CSI-CLI-00189310 – CSI-CLI-00191711.

27 IOS XE v. 2.1: Source Code, CSI-CLI-00229755 – CSI-CLI-00236535, CSI-CLI-  
28 00268939 – CSI-CLI-00271384, CSI-CLI-00271915 – CSI-CLI-00274106, CSI-CLI-00274388 –

1 CSI-CLI-00276837, CSI-CLI-00313895 – CSI-CLI-00314421, CSI-CLI-00325377 – CSI-CLI-  
2 00325496.

3 IOS XE v. 3.5: Source Code, CSI-CLI-00180764 – CSI-CLI-00189309, CSI-CLI-  
4 00228225 – CSI-CLI-00229754, CSI-CLI-00236536 – CSI-CLI-00236768, CSI-CLI-00237168 –  
5 CSI-CLI-00237494, CSI-CLI-00237785 – CSI-CLI-00237793, CSI-CLI-00239782 – CSI-CLI-  
6 00241095, CSI-CLI-00248138 – CSI-CLI-00267772, CSI-CLI-00277170 – CSI-CLI-00277359,  
7 CSI-CLI-00288214 – CSI-CLI-00288321, CSI-CLI-00288673 – CSI-CLI-00289121, CSI-CLI-  
8 00310346 – CSI-CLI-00313894.

9 NX-OS v. 4.0: Source Code, CSI-CLI-00054566 – CSI-CLI-00054597, CSI-CLI-  
10 00191712 – CSI-CLI-00192226, CSI-CLI-00202929 – CSI-CLI-00207082.

11 NX-OS v. 5.0: Source Code, CSI-CLI-00173413 – CSI-CLI-00176459, CSI-CLI-  
12 00196923 – CSI-CLI-00197194, CSI-CLI-00197411 – CSI-CLI-00197600, CSI-CLI-00199585 –  
13 CSI-CLI-00200362, CSI-CLI-00201361 – CSI-CLI-00201380, CSI-CLI-00201823 – CSI-CLI-  
14 00201848, CSI-CLI-00207083 – CSI-CLI-00212262, CSI-CLI-00216926 – CSI-CLI-00216955.

15 NX-OS v. 5.2: Source Code, CSI-CLI-00176460 – CSI-CLI-00178217, CSI-CLI-  
16 00196489 – CSI-CLI-00196922, CSI-CLI-00197195 – CSI-CLI-00197410, CSI-CLI-00197601 –  
17 CSI-CLI-00199584, CSI-CLI-00200363 – CSI-CLI-00201360, CSI-CLI-00201381 – CSI-CLI-  
18 00201822, CSI-CLI-00201849 – CSI-CLI-00202928.

19 NX-OS v. 6.2: Source Code, CSI-CLI-00178218 – CSI-CLI-00180763, CSI-CLI-  
20 00192227 – CSI-CLI-00196488, CSI-CLI-00212263 – CSI-CLI-00216925.

21 EOS 4.0.1: Source Code, CSI-CLI-00007244 – CSI-CLI-00007472.

22 EOS 4.6.2: Source Code, CSI-CLI-00006858 – CSI-CLI-00007243.

23 EOS 4.10.0: Source Code, CSI-CLI-00007841 – CSI-CLI-00008984.

24 EOS 4.11.1.2: Source Code, CSI-CLI-00010517 – CSI-CLI-00011972.

25 EOS 4.12.4: Source Code, CSI-CLI-00014141 – CSI-CLI-00016000.

26 EOS 4.13.6F: Source Code, CSI-CLI-00016001 – CSI-CLI-00018140.

27 EOS 4.13.7M: Source Code, CSI-CLI-00011973 – CSI-CLI-00014140.

28 EOS 4.14.3F: Source Code, CSI-CLI-00018146 – CSI-CLI-00020377.

1 EOS 4.14.5F: Source Code, CSI-CLI-00000084 – CSI-CLI-00002331.

2 EOS 4.14.6M: Source Code, CSI-CLI-00004616 – CSI-CLI-00006857.

3 EOS 4.15.0F: Source Code, CSI-CLI-00002332 – CSI-CLI-00004615.

4 Cisco’s discovery efforts in this case are ongoing, and Cisco reserves the right to further  
5 supplement this response in light of facts learned during discovery, including information  
6 regarding Arista’s accused products (including source code and other non-public materials) and  
7 expert discovery.

8  
9 **INTERROGATORY NO. 5:**

10 State in detail the derivation of each CLI Command used by Cisco, including without  
11 limitation all CLI Commands that You contend Arista has unlawfully copied.

12  
13 **RESPONSE TO INTERROGATORY NO. 5:**

14 Cisco incorporates by reference its General Objections as though fully set forth herein.  
15 Cisco further objects to this interrogatory as irrelevant and not calculated to lead to the discovery  
16 of admissible evidence to the extent it (1) calls for evidence pertaining to specific similarities  
17 between Cisco’s copyrighted works and individual CLI commands copied by Arista, (2) seeks  
18 information not relevant to the copyrightability of Cisco’s works-in-suit, and (3) seeks information  
19 regarding acts not at issue in this suit. Cisco further objects to the characterization in this  
20 interrogatory that any Cisco CLI command was derived. Cisco further objects to this  
21 interrogatory to the extent that it calls for information that is publicly available or equally  
22 available to Arista, and therefore is of no greater burden for Arista to obtain than for Cisco to  
23 obtain. Cisco also objects to this interrogatory as undefined, vague, ambiguous, overbroad, and  
24 unduly burdensome in its use of the terms “derivation,” “each CLI command used by Cisco,” and  
25 “all CLI Commands that You contend Arista has unlawfully copied.” Cisco further objects to  
26 this interrogatory to the extent it seeks information that is protected by the attorney-client  
27 privilege, that constitutes attorney work-product, or that is protected by any other applicable  
28

1 DATED: August 7, 2015

Respectfully submitted,

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**PROOF OF SERVICE**

I hereby certify that, at the date entered below and per the agreement of the parties, I caused a true and correct copy of the foregoing to be served by transmission via the email addresses below:

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I declare under penalty of perjury that the foregoing is true and correct. Executed on August 7, 2015, at Berkeley, California.

/s/ Matthew D. Cannon

Matthew D. Cannon

**INTERROGATORY NO. 2 FIRST SUPPLEMENTAL RESPONSE – EXHIBIT B**

<b>Cisco CLI Command Expression</b>	<b>Copyrighted Work(s) in Which Cisco's CLI Command Expression Appears</b>	<b>Substantially Similar Arista CLI Command Expression</b>	<b>Infringing Work(s) in Which Command Expression Appears</b>
aaa accounting	Cisco IOS 11.0 through 15.4; IOS XR 3.0 through 5.2; IOS XE 2.1 through 3.5	aaa accounting	EOS v. 4.10.0, EOS v. 4.11.1.2, EOS v. 4.11.2.1, EOS v. 4.12.4, EOS v. 4.13.6F, EOS v. 4.13.7M, EOS v. 4.14.3F, EOS v. 4.14.5F, EOS v. 4.14.6M, EOS v. 4.15.0F
aaa accounting dot1x	IOS XE 3.5; NX-OS 4.0 through 6.2	aaa accounting dot1x	EOS v. 4.13.6F, EOS v. 4.13.7M, EOS v. 4.14.3F, EOS v. 4.14.5F, EOS v. 4.14.6M, EOS v. 4.15.0F
aaa authentication login	Cisco IOS 11.0 through 15.4; IOS XR 3.0 through 5.2; IOS XE 2.1 through 3.5	aaa authentication login	EOS v. 4.0.1, EOS v. 4.4.0, EOS v. 4.6.2, EOS v. 4.10.0, EOS v. 4.11.1.2, EOS v. 4.11.2.1, EOS v. 4.12.4, EOS v. 4.13.6F, EOS v. 4.13.7M, EOS v. 4.14.3F, EOS v. 4.14.5F, EOS v. 4.14.6M, EOS v. 4.15.0F
aaa authorization config-commands	Cisco IOS 11.2 through 15.4; IOS XE 3.5	aaa authorization config-commands	EOS v. 4.0.1, EOS v. 4.4.0, EOS v. 4.6.2, EOS v. 4.10.0, EOS v. 4.11.1.2, EOS v. 4.11.2.1, EOS v. 4.12.4, EOS v. 4.13.6F, EOS v. 4.13.7M, EOS v. 4.14.3F, EOS v. 4.14.5F, EOS v. 4.14.6M, EOS v. 4.15.0F
aaa authorization console	Cisco IOS 12.0 through 15.4; IOS XE 3.5	aaa authorization console	EOS v. 4.4.0, EOS v. 4.6.2, EOS v. 4.10.0, EOS v. 4.11.1.2, EOS v. 4.11.2.1, EOS v. 4.12.4, EOS v. 4.13.6F, EOS v. 4.13.7M, EOS v. 4.14.3F, EOS v. 4.14.5F, EOS v. 4.14.6M, EOS v. 4.15.0F

**INTERROGATORY NO. 2 FIRST SUPPLEMENTAL RESPONSE – EXHIBIT B**

<b>Cisco CLI Command Expression</b>	<b>Copyrighted Work(s) in Which Cisco's CLI Command Expression Appears</b>	<b>Substantially Similar Arista CLI Command Expression</b>	<b>Infringing Work(s) in Which Command Expression Appears</b>
aaa group server radius	Cisco IOS 12.0 through 15.4; IOS XR 3.2 through 5.2; IOS XE 2.1 through 3.5; NX-OS 4.0 through 6.2	aaa group server radius	EOS v. 4.6.2, EOS v. 4.10.0, EOS v. 4.11.1.2, EOS v. 4.11.2.1, EOS v. 4.12.4, EOS v. 4.13.6F, EOS v. 4.13.7M, EOS v. 4.14.3F, EOS v. 4.14.5F, EOS v. 4.14.6M, EOS v. 4.15.0F
aaa group server tacacs+	Cisco IOS 12.0 through 15.4; IOS XR 3.0 through 5.2; IOS XE 3.5; NX-OS 4.0 through 6.2	aaa group server tacacs+	EOS v. 4.0.1, EOS v. 4.4.0, EOS v. 4.6.2, EOS v. 4.10.0, EOS v. 4.11.1.2, EOS v. 4.11.2.1, EOS v. 4.12.4, EOS v. 4.13.6F, EOS v. 4.13.7M, EOS v. 4.14.3F, EOS v. 4.14.5F, EOS v. 4.14.6M, EOS v. 4.15.0F
address-family	Cisco IOS 12.0 through 15.4; IOS XR 3.0 through 5.2; IOS XE 2.1 through 3.5; NX-OS 4.0 through 6.2	address-family	EOS v. 4.10.0, EOS v. 4.11.1.2, EOS v. 4.11.2.1, EOS v. 4.12.4, EOS v. 4.13.6F, EOS v. 4.13.7M, EOS v. 4.14.3F, EOS v. 4.14.5F, EOS v. 4.14.6M, EOS v. 4.15.0F
aggregate-address	Cisco IOS 11.0 through 15.4; IOS XR 3.0 through 5.2; IOS XE 2.1; NX-OS 4.0 through 6.2	aggregate-address	EOS v. 4.10.0, EOS v. 4.11.1.2, EOS v. 4.11.2.1, EOS v. 4.12.4, EOS v. 4.13.6F, EOS v. 4.13.7M, EOS v. 4.14.3F, EOS v. 4.14.5F, EOS v. 4.14.6M, EOS v. 4.15.0F
area default-cost	Cisco IOS 11.0 through 15.4; IOS XE 3.5; NX-OS 4.0 through 6.2	area default-cost (OSPFv2)	EOS v. 4.6.2, EOS v. 4.10.0, EOS v. 4.11.1.2, EOS v. 4.11.2.1, EOS v. 4.12.4, EOS v. 4.13.6F, EOS v. 4.13.7M, EOS v. 4.14.3F, EOS v. 4.14.5F, EOS v. 4.14.6M, EOS v. 4.15.0F



**INTERROGATORY NO. 2 FIRST SUPPLEMENTAL RESPONSE – EXHIBIT B**

<b>Cisco CLI Command Expression</b>	<b>Copyrighted Work(s) in Which Cisco's CLI Command Expression Appears</b>	<b>Substantially Similar Arista CLI Command Expression</b>	<b>Infringing Work(s) in Which Command Expression Appears</b>
vrrp ip secondary	IOS 12.0 through 15.4; IOS XE 3.5	vrrp ip secondary	EOS v. 4.4.0, EOS v. 4.10.0, EOS v. 4.11.1.2, EOS v. 4.11.2.1, EOS v. 4.12.4, EOS v. 4.13.6F, EOS v. 4.13.7M, EOS v. 4.14.3F, EOS v. 4.14.5F, EOS v. 4.14.6M, EOS v. 4.15.0F
vrrp preempt	Cisco IOS 12.0 through 15.4; IOS XR 3.0 through 5.2; IOS XE 3.5	vrrp preempt	EOS v. 4.4.0, EOS v. 4.10.0, EOS v. 4.11.1.2, EOS v. 4.11.2.1, EOS v. 4.12.4, EOS v. 4.13.6F, EOS v. 4.13.7M, EOS v. 4.14.3F, EOS v. 4.14.5F, EOS v. 4.14.6M, EOS v. 4.15.0F
vrrp priority	Cisco IOS 12.0 through 15.4; IOS XR 3.0 through 5.2; IOS XE 3.5	vrrp priority	EOS v. 4.4.0, EOS v. 4.10.0, EOS v. 4.11.1.2, EOS v. 4.11.2.1, EOS v. 4.12.4, EOS v. 4.13.6F, EOS v. 4.13.7M, EOS v. 4.14.3F, EOS v. 4.14.5F, EOS v. 4.14.6M, EOS v. 4.15.0F
vrrp shutdown	Cisco IOS 12.4 through 15.4; IOS XE 3.5	vrrp shutdown	EOS v. 4.4.0, EOS v. 4.10.0, EOS v. 4.11.1.2, EOS v. 4.11.2.1, EOS v. 4.12.4, EOS v. 4.13.6F, EOS v. 4.13.7M, EOS v. 4.14.3F, EOS v. 4.14.5F, EOS v. 4.14.6M, EOS v. 4.15.0F

**INTERROGATORY NO. 2 FIRST SUPPLEMENTAL RESPONSE – EXHIBIT B**

<b>Cisco CLI Command Expression</b>	<b>Copyrighted Work(s) in Which Cisco's CLI Command Expression Appears</b>	<b>Substantially Similar Arista CLI Command Expression</b>	<b>Infringing Work(s) in Which Command Expression Appears</b>
vrrp timers advertise	Cisco IOS 12.0 through 15.4; IOS XE 3.5	vrrp timers advertise	EOS v. 4.4.0, EOS v. 4.10.0, EOS v. 4.11.1.2, EOS v. 4.11.2.1, EOS v. 4.12.4, EOS v. 4.13.6F, EOS v. 4.13.7M, EOS v. 4.14.3F, EOS v. 4.14.5F, EOS v. 4.14.6M, EOS v. 4.15.0F

**INTERROGATORY NO. 2 FIRST SUPPLEMENTAL RESPONSE – EXHIBIT C**

<b>Cisco Command Mode</b>	<b>Cisco Prompt</b>	<b>Copyrighted Work(s) in Which Cisco's Command Mode and Prompt Appears</b>	<b>Substantially Similar Arista Command Mode</b>	<b>Substantially Similar Arista Prompt</b>	<b>Infringing Work(s) in Which Command Mode and Prompt Appears</b>
User EXEC	router>	IOS 11.0 through IOS 15.4; IOS XE 2.1 through IOS XE 3.5; IOS XR 3.0 through IOS XR 5.2	EXEC	switch>	EOS v. 4.0.1, EOS v. 4.4.0, EOS v. 4.6.2, EOS v. 4.10.0, EOS v. 4.11.1.2, EOS v. 4.11.2.1, EOS v. 4.12.4, EOS v. 4.13.6F, EOS v. 4.13.7M, EOS v. 4.14.3F, EOS v. 4.14.5F, EOS v. 4.14.6M, EOS v. 4.15.0F
Privileged EXEC	router#	IOS 11.0 through IOS 15.4; IOS XE 2.1 through IOS XE 3.5; IOS XR 3.0 through IOS XR 5.2	Privileged EXEC	switch#	EOS v. 4.0.1, EOS v. 4.4.0, EOS v. 4.6.2, EOS v. 4.10.0, EOS v. 4.11.1.2, EOS v. 4.11.2.1, EOS v. 4.12.4, EOS v. 4.13.6F, EOS v. 4.13.7M, EOS v. 4.14.3F, EOS v. 4.14.5F, EOS v. 4.14.6M, EOS v. 4.15.0F
Global Configuration	router(config)#	IOS 11.0 through IOS 15.4; IOS XE 2.1 through IOS XE 3.5; IOS XR 3.0 through IOS XR 5.2	Global Configuration	switch(config)#	EOS v. 4.0.1, EOS v. 4.4.0, EOS v. 4.6.2, EOS v. 4.10.0, EOS v. 4.11.1.2, EOS v. 4.11.2.1, EOS v. 4.12.4, EOS v. 4.13.6F, EOS v. 4.13.7M, EOS v. 4.14.3F, EOS v. 4.14.5F, EOS v. 4.14.6M, EOS v. 4.15.0F

**INTERROGATORY NO. 2 FIRST SUPPLEMENTAL RESPONSE – EXHIBIT C**

<b>Cisco Command Mode</b>	<b>Cisco Prompt</b>	<b>Copyrighted Work(s) in Which Cisco's Command Mode and Prompt Appears</b>	<b>Substantially Similar Arista Command Mode</b>	<b>Substantially Similar Arista Prompt</b>	<b>Infringing Work(s) in Which Command Mode and Prompt Appears</b>
Interface Configuration	router(config-if)#	IOS 11.0 through IOS 15.4; IOS XE 2.1 through IOS XE 3.5; IOS XR 3.0 through IOS XR 5.2	Interface Configuration	switch(config-if)#	EOS v. 4.0.1, EOS v. 4.4.0, EOS v. 4.6.2, EOS v. 4.10.0, EOS v. 4.11.1.2, EOS v. 4.11.2.1, EOS v. 4.12.4, EOS v. 4.13.6F, EOS v. 4.13.7M, EOS v. 4.14.3F, EOS v. 4.14.5F, EOS v. 4.14.6M, EOS v. 4.15.0F
User EXEC	switch>	NX-OS 4.0	EXEC	switch>	EOS v. 4.0.1, EOS v. 4.4.0, EOS v. 4.6.2, EOS v. 4.10.0, EOS v. 4.11.1.2, EOS v. 4.11.2.1, EOS v. 4.12.4, EOS v. 4.13.6F, EOS v. 4.13.7M, EOS v. 4.14.3F, EOS v. 4.14.5F, EOS v. 4.14.6M, EOS v. 4.15.0F
Privileged EXEC	switch#	NX-OS 4.0 through NX-OS 5.2	Privileged EXEC	switch#	EOS v. 4.0.1, EOS v. 4.4.0, EOS v. 4.6.2, EOS v. 4.10.0, EOS v. 4.11.1.2, EOS v. 4.11.2.1, EOS v. 4.12.4, EOS v. 4.13.6F, EOS v. 4.13.7M, EOS v. 4.14.3F, EOS v. 4.14.5F, EOS v. 4.14.6M, EOS v. 4.15.0F

**INTERROGATORY NO. 2 FIRST SUPPLEMENTAL RESPONSE – EXHIBIT C**

<b>Cisco Command Mode</b>	<b>Cisco Prompt</b>	<b>Copyrighted Work(s) in Which Cisco's Command Mode and Prompt Appears</b>	<b>Substantially Similar Arista Command Mode</b>	<b>Substantially Similar Arista Prompt</b>	<b>Infringing Work(s) in Which Command Mode and Prompt Appears</b>
EXEC	switch#	NX-OS 5.0 through NX-OS 6.2	Privileged EXEC	switch#	EOS v. 4.0.1, EOS v. 4.4.0, EOS v. 4.6.2, EOS v. 4.10.0, EOS v. 4.11.1.2, EOS v. 4.11.2.1, EOS v. 4.12.4, EOS v. 4.13.6F, EOS v. 4.13.7M, EOS v. 4.14.3F, EOS v. 4.14.5F, EOS v. 4.14.6M, EOS v. 4.15.0F
Global Configuration	switch(config)#	NX-OS 4.0 through NX-OS 6.2	Global Configuration	switch(config)#	EOS v. 4.0.1, EOS v. 4.4.0, EOS v. 4.6.2, EOS v. 4.10.0, EOS v. 4.11.1.2, EOS v. 4.11.2.1, EOS v. 4.12.4, EOS v. 4.13.6F, EOS v. 4.13.7M, EOS v. 4.14.3F, EOS v. 4.14.5F, EOS v. 4.14.6M, EOS v. 4.15.0F
Interface Configuration	switch(config-if)#	NX-OS 4.0 through NX-OS 6.2	Interface Configuration	switch(config-if)#	EOS v. 4.0.1, EOS v. 4.4.0, EOS v. 4.6.2, EOS v. 4.10.0, EOS v. 4.11.1.2, EOS v. 4.11.2.1, EOS v. 4.12.4, EOS v. 4.13.6F, EOS v. 4.13.7M, EOS v. 4.14.3F, EOS v. 4.14.5F, EOS v. 4.14.6M, EOS v. 4.15.0F